

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

VISUAL SEMICONDUCTOR, INC.,

Appellant,

v.

STREAM TV NETWORKS, INC. *et al.*,

Debtors-in-Possess.

AND

WILLIAM A. HOMONY, *et al.*,

Trustees.

---

Civil No. 2:24-cv-6617-JMG

**APPELLEE’S DESIGNATION OF ADDITIONAL ITEMS  
TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Federal Rule of Bankruptcy Procedure 8009, William A. Homony (the “Trustee”), in his capacity as Chapter 11 trustee of the bankruptcy estates of Stream TV Networks, Inc. (“Stream”) and Technovative Media, Inc. (“Technovative”) (when referred to with Stream, the “Debtors”), appellee in the appeal jointly noticed by Visual Semiconductor, Inc. (“VSI”) and Rembrandt 3D Holding, Ltd. (“Rembrandt” and together with VSI, the “Appellants”), on December 9, 2024 (the “Appeal”), files this Designation of Additional Items to be Included in the Record on Appeal (the “Designation”) in the above-captioned case and requests that the Clerk prepare and forward the items listed herein to the District Court for inclusion in the record in connection with the Appeal.

**DESIGNATION**

1. On June 6, 2024, the Court entered the Order Granting a Motion to Approve Compromise under Rule 9019 [D.I. 653]. On September 30, 2024, the Trustee filed a Motion for (I) an Order (A) Approving the Bidding Procedures and Form of Asset Purchase Agreement for the Sale of Substantially all of the Debtors' Assets, (B) Establishing the Notice Procedures and Approving the Form and Manner of Notice Thereof and Scheduling a Sale by Auction, (C) Approving Procedures for the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (D) Scheduling a Sale Hearing, (E) Granting Expedited Consideration Pursuant to Local Rule of Bankruptcy Procedure 5070-1(g), and (F) Granting Related Relief, and (II) an Order (A) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related Thereto, and (C) Granting Related Relief [D.I. 750]. On November 20, 2024, the Court entered an Order Granting (A) Approving Bidding Procedures And Form Of Asset Purchase Agreement In Connection With The Sale Of Substantially All Of The Debtors' Assets, (B) Approving Procedures For The Assumption And Assignment Of Executory Contracts And Unexpired Leases, (C) Approving Procedures For Selection Of A Stalking Horse Bidder And Bid Protections, And (D) Granting Related Relief [D.I. 811]. On December 9, 2024, the Court entered an Order (A) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related thereto, and (C) Granting Related Relief [D.I. 876]. On December 26, 2024, the Appellants filed their Statement of Issues and Designation of Items to be Included in the Record on Appeal [D.I. 900].

2. The Trustee respectfully designates the following additional items to be included in the appellate record pursuant to Bankruptcy Rule 8009:<sup>1</sup>

<b>Bankruptcy Docket Number</b>	<b>Date Entered in the Bankruptcy Docket</b>	<b>Brief Description of the Document or Transcript</b>
548	1/5/2024	Memorandum Opinion Regarding Appointment of Chapter 11 Trustee
549	1/5/2024	Order Granting Motion to Appoint Chapter 11 Trustee
554	1/9/2024	Notice of Appointment of William A. Homony, CIRA as Chapter 11 Trustee
630	5/6/2024	Motion of William A. Homony in his Capacity as Chapter 11 Trustee for Entry of an Order Approving a Settlement Agreement and Mutual Release with Hawk Investment Holdings, Ltd., as Collateral Agent for The Secured Noteholders of Seecubic, Inc., Pursuant To Fed. R. Bankr. P. 9019(a) and 11 U.S.C. § 105(a)
642	5/20/2024	Objection of Visual Semiconductor, Inc. to the Motion of the Chapter 11 Trustee to Approve Settlement Agreement And Mutual Release with Hawk Investment Holdings, Ltd, as Collateral Agent for The Secured Noteholders of Seecubic, Inc., Pursuant to Fed. R. Bankr. P. 9109(a) and 11 U.S.C. § 105
653	6/6/2024	Order Approving a Settlement Agreement and Mutual Release with Hawk Investment Holdings, Ltd. (“Hawk”), as Collateral Agent for the secured noteholders of SeeCubic, Inc. (“SeeCubic”), Pursuant to Fed. R. Bankr. P. 9019(a) and 11 U.S.C. § 105(a)
657	6/12/2024	Motion of Spector Gadon Rosen Vinci P.C. to Withdraw as Attorney to Visual Semiconductor, Inc.
660	6/13/2024	Amended Motion of Spector Gadon Rosen Vinci P.C. to Withdraw as Attorney to Visual Semiconductor, Inc.
663	6/14/2024	Hawk Investment Holdings Ltd.’s Limited Objection to Amended Motion of Spector Gadon Rosen Vinci P.C. to Withdraw as Attorney to Visual Semiconductor, Inc.

<sup>1</sup> Unless otherwise indicated, all designated items include attached exhibits and declarations.

670	6/17/2024 <i>Transcript Attached as Exhibit "A"</i>	Transcript of Hearing Held on June 5, 2024
682	6/20/2024	Order Granting Amended Motion of Spector Gadon Rosen Vinci P.C. to Withdraw as Attorney to Visual Semiconductor, Inc.
686	6/20/2024	Visual Semiconductor, Inc.'s Motion to Reconsider and/or Clarify Order Approving Settlement Agreement Between Chapter 11 Trustee and Hawk Investment Holdings, Ltd (ECF No. 653)
700	7/5/2024	Opposition of William A. Homony In His Capacity as Chapter 11 Trustee to Motion of Visual Semiconductor, Inc. to Reconsider and/or Clarify Order Approving Settlement Agreement Between Chapter 11 Trustee and Hawk Investment Holdings, Ltd.
732	9/6/2024	Trustee's Amended Application to Employ SSG Advisors, LLC as Investment Banker
740	9/18/2024	Certificate of No Response to Trustee's Amended Application to Employ SSG Advisors, LLC as Investment Banker
741	9/20/2024	Order Granting Trustee's Amended Application to Employ SSG Advisors, LLC as Investment Banker
798	11/12/2024	Praeipce to Supplement VSI's Objection to Trustee's Motion for, inter alia, an Order (A) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related thereto, and (C) Granting Related Relief
799	11/12/2024	Motion to Extend time to Deadlines, Timing, and Amount of Certain Obligations in the Sharing and Carve-Out Agreement Between the Trustee and Hawk Investment Holdings, Ltd. as Collateral Agent of the Secured Noteholders of SeeCubic, Inc., and for Related Relief

802	11/12/2024	Visual Semiconductor, Inc.'s Witness and Exhibit List for November 13 Hearing
805	11/14/2024	Order Denying Motion for Reconsideration; Granting Motion to Quash with Respect to the Remaining VSI Discovery Requests; Denying Motion to Compel with Respect to Remaining Discovery Requests.
809	11/19/2024	Proposed Order (A) Approving the Bidding Procedures and Form of Asset Purchase Agreement for the Sale of Substantially All of the Debtors' Assets, (B) Approving Procedures for the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (C) Approving Procedures for Selection of a Stalking Horse Bidder and Bid Protections, and (D) Granting Related Relief
841	12/2/2024	Interested Party Leia Inc.'s Reservation of Rights regarding Trustee's Motion for, inter alia, an Order (A) Approving the Sale of the Debtors' Assets Free and Clear of All Liens, Claims, Encumbrances, and Other Interests, (B) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases Related thereto, and (C) Granting Related Relief
845	12/2/2024	Trustee's Notice of No Auction to be Held and Selection of Successful Bidder
895	12/19/2024	Order Granting Motion to Extend Deadlines, Timing, and Amount of Certain Obligations in the Sharing and Carve-Out Agreement between the Trustee and Hawk Investment Holdings Ltd. as Collateral Agent of the Secured Noteholders of SeeCubic, Inc. and for Related Relief
915	1/6/2025	Notice of Closing on Sale of Substantially All of the Assets of Stream TV Networks, Inc. and Technovative Media Inc.
916	1/8/2025	Opinion on Order Approving the Sale of Substantially All Assets of Stream TV Networks, Inc. and Technovative Media Inc. to SeeCubic, Inc.

**RESERVATION OF RIGHTS**

The Trustee expressly reserves his right to amend or supplement this Designation and/or to object, or otherwise supplement or move to strike or modify, some or all of any designation filed by any other party to this appeal. This filing is made expressly subject to and without waiver of any and all rights, remedies, challenges, and objections.

Respectfully submitted,

/s/ Michael D. Vagnoni

Edmond M. George, Esquire  
Michael D. Vagnoni, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
Centre Square West  
1500 Market Street, Suite 3400  
Philadelphia, PA 19102  
Telephone: (215) 665-3066  
Facsimile: (215) 665-3165  
E-mail addresses:  
edmond.george@obermayer.com  
michael.vagnoni@obermayer.com  
*Counsel to William Homony, Chapter 11 Trustee*

and

Steven M. Coren, Esquire  
Andrew J. Belli, Esquire  
COREN & RESS, P.C.  
Two Commerce Square  
2001 Market Street, Suite 3900  
Philadelphia, PA 19103  
Tel: (215) 735-8700  
Fax: (215) 735-5170  
scoren@kcr-law.com  
abelli@kcr-law.com  
*Special Counsel to William Homony, Chapter 11 Trustee*

Dated: January 9, 2025